

EXHIBIT M

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

MANIKANTA PASULA, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, et al.,

Defendants.

Case No.

DECLARATION OF HANGRUI ZHANG

I, Hangrui Zhang, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Hangrui Zhang.

2. I am a citizen of People's Republic of China. I currently live in Massachusetts.

3. I first entered the United States in August 2023 to begin my Ph.D. in Electronic and Computer Science at Worcester Polytechnic Institute. During these years, I kept my GPA 4.0/4.0 and delivered an excellent job to my research advisor.

4. Most recently, on April 9, 2025, I was informed that my SEVIS record was terminated. The SEVIS record indicated the following: "OTHER – Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated."

5. I unfortunately have one arrest record in December 2024, stemming from a total misunderstanding. On December 6, 2024, I was arrested and charged with shoplifting in Worcester, MA, because I was trying to buy a cup of coffee at Starbucks, which is near the exit, and that movement made the security misunderstand me. In that case, I was falsely accused of stealing from that local store. However, the case was dismissed through the pretrial diversion.

6. I do not have any criminal record in China.

7. I have complied with all rules and regulations as an F-1 student. I do not understand why my F-1 student status was terminated.

8. The termination of my F-1 visa status has left me deeply worried about both my personal safety and long-term future. Not knowing where I stand legally in the United States has caused significant emotional distress, especially after years of dedicated effort toward my academic and career aspirations.

9. Without F-1 student status, my ability to continue my studies, contribute to research, and pursue my professional goals is in jeopardy. I am terrified of being compelled to leave the United States before completing my Ph.D., which would interrupt everything I have worked for. This unexpected situation has made me feel exposed and uncertain—not just about the present but about where my life is headed. My entire academic and career path is deeply tied to the opportunities I have built here, and the idea of losing all of it is both frightening and destabilizing.

10. The cancellation of my SEVIS record has left me fearful of possible immigration detention and removal from the country, as I may no longer hold valid student status. I am especially concerned about being abruptly detained and transferred to distant locations such as Louisiana.

11. Additionally, I am no longer permitted to work as a research assistant, nor can I receive financial support from my doctoral program. This has created serious academic and financial hardship, as the assistantship was not only my sole income source but also an essential part of my Ph.D. training.

12. As a second-year doctoral student, I am expected to prepare a publication under my advisor's supervision. I have dedicated several months to this project. However, because I'm now

unable to conduct research, I fear the opportunity to publish my findings has been lost. This could significantly slow my academic progress and delay major milestones, including my Ph.D. qualification.

13. I have already fulfilled most of the coursework requirements. At this stage of my doctoral studies, research has become my primary focus. As a PhD candidate, my department has a Diagnostic Examination Requirement which says: The doctoral student is required to complete the diagnostic examination requirement during the first year beyond the M.S. degree (or equivalent number of credits, for students admitted directly to the Ph.D. program) with a grade of Pass. As a student who was admitted directly into the Ph.D. program, I am currently completing the M.S. degree requirements and am scheduled to take the associated examination next year. However, since the termination of my SEVIS record, my funding has been cut off, forcing me to halt my research activities with my advisor. This disruption has had a serious impact on the progress of my work, and my Research Advisor and Committee will assess my performance within the context of these challenges. If I receive a Fail on this examination, it will result in my removal from the graduate program, effectively ending my pursuit of a Ph.D.

14. Being unable to carry on with my research as a result of my SEVIS record termination would interfere with my academic schedule and potentially postpone my degree completion. This setback would seriously hinder my academic advancement and threaten my financial security, as I risk losing my stipend altogether if I'm compelled to extend my studies past the usual duration due to factors outside of my control.

15. I have maintained my student status through my F-1 student status including attending a full course of studies.

16. I have not engaged in any unauthorized employment in the United States.

17. I have been truthful to U.S. government officials.

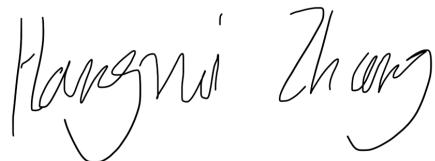
18. I have not been convicted of any crime of violence in the United States.

19. I am not aware that the U.S. government put me in the federal register to terminate my F-1 student status.

20. I want to be a named plaintiff in this case. I understand that, as a class representative, it would be my responsibility to represent the interests of all the class members in this lawsuit, and not just my own personal interests. I also understand the need to stay informed about what is happening in the case.

21. I understand that I am agreeing to represent many students and graduates like me.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Hangrui Zhang".

Hangrui Zhang
Executed on April 15, 2025.